## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

# INDICTMENT FOR VIOLATIONS OF THE FEDERAL CONTROLLED SUBSTANCES ACT

UNITED STATES OF AMERICA \* CRIMINAL NO:

v. \* SECTION:

ROBERT LEE \* VIOLATION: 21 U.S.C. § 846

a/k/a Raazaan Muhammed 21 U.S.C. § 841(a)(1)

\* 21 U.S.C. § 841(b)(1)(B)

21 U.S.C. § 841(b)(1)(C)

\* \* \*

The Grand Jury charges that:

#### **COUNT ONE**

Beginning at a time unknown and continuing until on or about October 31, 2009, in the Eastern District of Louisiana, and elsewhere, the defendant, ROBERT LEE, a/k/a Raazaan Muhammed, did knowingly and intentionally combine, conspire, confederate and agree with other persons known and unknown to the Grand Jury, to distribute and to possess with the intent to distribute five hundred grams or more of cocaine hydrochloride, a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B); all in violation of Title 21, United States Code, Section 846.

#### **COUNT TWO**

On or about October 31, 2009, in the Eastern District of Louisiana, the defendant, **ROBERT LEE**, **a/k/a Raazaan Muhammed**, did knowingly and intentionally possess with the intent to distribute a quantity of cocaine hydrochloride, a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

### **NOTICE OF FORFEITURE**

- 1. The allegations of Counts One and Two of this indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 21, United States Code, Section 853.
- 2. As a result of the offenses alleged in Counts One and Two, the defendant, **ROBERT LEE**, **a/k/a Raazaan Muhammed**, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Counts One and Two of this indictment.
- 3. If any of the above described forfeitable property, as a result of any act or omission of the defendant:
  - a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third person;
  - c. has been placed beyond the jurisdiction of the Court;
  - d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 21, United States Code, Section 853.

A TRUE BILL:

FOREPERSON	

JIM LETTEN

United States Attorney Bar. Roll No. 8517

IANIA (ACELLA (AND.)

JAN MASELLI MANN Chief, Criminal Division Assistant United States Attorney Bar Roll No. 9020

ANDRE' IONEC

ANDRE' JONES Assistant United States Attorney Bar Roll No. 23502

New Orleans, Louisiana November 5, 2009